

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
BRUNSWICK DIVISION**

STATE OF MISSOURI,  
STATE OF GEORGIA,  
STATE OF ALABAMA  
STATE OF ARKANSAS,  
STATE OF FLORIDA,  
STATE OF NORTH DAKOTA, and  
STATE OF OHIO

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF  
EDUCATION,

MIGUEL A. CARDONA, in his official  
capacity as Secretary, United States  
Department of Education, and

JOSEPH R. BIDEN, Jr., in his official  
capacity as President of the United States,

*Defendants.*

Civil Action No. 2:24-cv-00103-LGW-BWC

**MOTION TO SEAL CONTENTS OF EXHIBITS D AND F**

Plaintiff States move for permission to seal the contents of Exhibits D and F until final judgment or Defendants consent to unsealing. *See* L.R. 79.7. These exhibits contain documents submitted by Defendants to MOHELA, which Plaintiff States obtained through compulsory legal process. Defendants marked these documents confidential, stating that these materials are “sensitive but unclassified information” and “includ[e] proprietary data, interpretations and/or derivatives of such data provided by the Federal Student Aid (FSA) Contracting Office and/or entities other than the contracting parties.” *See* Ex. D at 1. Plaintiff States move to seal this

information in an abundance of caution, recognizing that Defendants are in the best position to determine any consequences of unsealing.

Date: September 3, 2024

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